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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JOSHUA GERSTEIN,
Plaintiff,

v.

CENTRAL INTELLIGENCE AGENCY,
et al.,
Defendant.

Case No. C 06-04643 MMC

**STIPULATION TO EXTEND
BRIEFING DEADLINES; ORDER**

The parties hereby stipulate to a one-week extension of the briefing deadlines set pursuant to the Court's August 30, 2007 Order. The bases for this stipulation are as follows:

1. Pursuant to the August 30 Order, defendants' reply in support of their motion for partial summary judgment (addressing issues regarding the agencies' searches for documents responsive to plaintiff's requests under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and the exemptions applied to withhold responsive information in non-case or non-investigation specific documents) is due to be filed on October 19, 2007; plaintiff's reply in support of his cross motion

STIPULATION TO EXTEND BRIEFING DEADLINES
Case No. C 06-04643 MMC

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1 for partial summary judgment is to be filed on November 2, 2007; and a hearing on the pending
2 motions is scheduled for November 30, 2007.

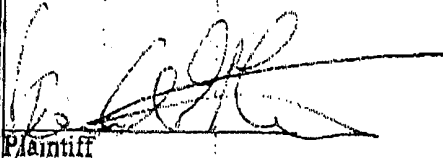
3 2. On September 26, 2007, defendants' counsel received copies of plaintiff's Opposition
4 to Defendants' Motion for Partial Summary Judgment, Cross Motion for Partial Summary
5 Judgment against defendant Department of Justice, Motion for In Camera Review and Limited
6 Discovery, and Motion for More Definite Statement from Defendant NSA Regarding Scope of
7 Search. Since being served with these papers, two hearings were scheduled in one of defendants'
8 counsel's other cases, both of which required preparation of documents and related materials as
9 well as travel from Washington, D.C., first to Reno, Nevada from October 10-12, 2007 and then
10 to Los Angeles, California from October 17-19, 2007. Due to these events, which were
11 unforeseen at the time the current briefing schedule was entered, defendants' counsel requires a
12 one-week extension of time, or until October 26, 2007, to prepare a reply in support of the
13 defendants' motion for partial summary judgment and oppositions to plaintiff's various motions.

14 3. Plaintiff stipulates to the request for a one-week extension of time for defendants to file
15 their papers. The parties also stipulate to shift the other briefing deadline accordingly, from the
16 current deadline of November 2 to November 9, 2007.


17 Accordingly, the parties stipulate to extend the briefing deadlines by one week.

18 Respectfully submitted,

19 JOSHUA GERSTEIN

20 
21
22 Plaintiff

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STIPULATION TO EXTEND BRIEFING DEADLINES
Case No. C 06-04643 MMC -2-

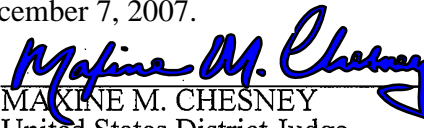
~~PROPOSED~~ ORDER

1 Upon consideration of the parties' stipulation, the briefing deadlines set by the August 30,
2 2007 Order are extended by one week, to reflect the following deadlines: October 26, 2007 for
3 defendants' Reply in Support of its Motion for Partial Summary Judgment and to respond to
4 plaintiff's motions filed with the court on September 22, 2007; and November 9, 2007, for
5 plaintiff's Reply in Support of Cross Motion for Partial Summary Judgment and in support of his
6 other pending motions.

7 PURSUANT TO STIPULATION, IT IS SO ORDERED.

8 It is further ORDERED that the hearing on the pending motions for summary judgment is
continued from November 30, 2007 to December 7, 2007.

9 Dated: October 22, 2007


MAXINE M. CHESNEY
United States District Judge